

Message

From: Pham, Lisa [Pham.Lisa@epa.gov]
Sent: 9/23/2022 5:35:37 PM
To: Maples, Brandon [Maples.Brandon@epa.gov]; Johnson, Ken-E [Johnson.Ken-E@epa.gov]; Bierschenk, Arnold [bierschenk.arnold@epa.gov]
Subject: RE: Texas/Louisiana Class VI Permitting

On May 11, 2022 Region 6 transmitted LDNR Class VI Primacy package to EPA-HQ. The reviewing process entered Phase III – Application Evaluation phase whose activities include program revision review, public hearings, and reviewing public comments. On August 3, Region 6 emailed LDNR some questions that were raised by EPA-OECA: civil and criminal statutes of limitations are not included in the submission, public participation in the State enforcement process seems not adequate and whether LDNR's burden of proof and degree of knowledge or intent are consistent with federal requirements for civil and criminal violations. On August 29, the Region contacted LDNR but was told that they have other priorities.

From: Maples, Brandon <Maples.Brandon@epa.gov>
Sent: Friday, September 23, 2022 12:29 PM
To: Johnson, Ken-E <Johnson.Ken-E@epa.gov>; Pham, Lisa <Pham.Lisa@epa.gov>; Bierschenk, Arnold <bierschenk.arnold@epa.gov>
Subject: FW: Texas/Louisiana Class VI Permitting

Any updates y'all are aware of regarding TX and LA (#1, 2, or 4)? Or edits to the responses I have?

Ex. 5 Deliberative Process (DP)

From: Green, Adam T. (Houston) <Adam.T.Green@Worley.com>
Sent: Wednesday, September 21, 2022 8:04 AM
To: Maples, Brandon <Maples.Brandon@epa.gov>
Subject: Texas/Louisiana Class VI Permitting

Hi, Brandon!

I have a couple questions about Class VI injection well permitting for the States of Texas and Louisiana. I found your contact information on EPA's website, so I was hoping you'd be a great person to talk to. If these questions are better discussed over the phone/Teams, I'm happy to set something up.

1. What is the most up to date status of Louisiana's primacy approval review?
2. Do you know when Texas plans to submit their application for approval? I know they made some regulatory changes to facilitate this.
3. I believe EPA HQ is estimating a 12-month turnaround for permit issuance once the application is administratively complete. Do you believe that (assuming no state primacy) EPA can meet this?
4. Do you think Louisiana and Texas could hold to this 12 month timeline if primacy is approved?

I understand there are a lot of question marks out there, so any guidance is much appreciated. It'd be great to connect regardless to build an open line of communication with the Agency.

Have a great day.

Thanks,

Adam Green, CUSP
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